

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

1998 Biennial Regulatory Review -- Review of  
the Commission's Broadcast Ownership Rules  
and Other Rules Adopted Pursuant to Section  
202 of the Telecommunications Act of 1996. )

MM Docket No. 98-35

**NATIONAL ASSOCIATION OF BROADCASTERS  
MOTION FOR EXTENSION OF TIME OF COMMENT  
AND REPLY COMMENT DEADLINES**

Pursuant to Section 1.46 of the Commission's Rules (47 C.F.R. §1.46), the National Association of Broadcasters<sup>1</sup> requests the Commission to extend -- by periods of sixty (60) days each -- the comment and reply comment deadlines in the above-captioned inquiry proceeding. In this proceeding the Commission has asked for public comment on several proposals to amend various Commission's multiple ownership and crossownership rules. These issues are critically important to the Commission, to broadcasters and to the public we serve.

The Commission's *Notice of Inquiry* ("*Notice*")<sup>2</sup> specifies May 22, 1998, and June 22, 1998, respectively, as the comment and reply comment deadlines in this proceeding. For the reasons stated below, NAB believes there is good cause for the agency providing a relatively brief extension in these deadlines. The recommended, revised comment and reply comment dates would be July 22, 1998 and August 21, 1998.

<sup>1</sup> NAB is a nonprofit, incorporated association of television and radio stations and broadcast networks which serves and represents the American broadcast industry.

<sup>2</sup> *Notice of Inquiry* in MM Docket No. 98-35, released March 13, 1998.

In reviewing the matters embodied in the *Notice*, NAB has identified several areas where we plan to complete research studies and analyses. These areas for research activity may include, but are not limited to, the following:

- An update to NAB's 1986-1987 study showing the number of outlets in each DMA, including newspapers, cable channels, DBS, magazines, radio and television stations and other media voices.
- A study using ratings and financial information showing the smaller audiences and revenues for UHF stations of similar market size, as compared to their VHF counterparts.
- A study of instances of newspaper/TV and/or newspaper/radio crossownership that shows the various synergies and increased services from these local, joint operations.

Additional and/or alternative studies also are being discussed among NAB's staff and various other interested parties. It our view that the results and interpretation of these studies will provide the Commission with a clearer foundation for taking subsequent rulemaking steps on these issues.

Furthermore, the issues contained in the *Notice*, and the NAB position on each, are the major subjects of the June 27-30, 1998, meeting of NAB's Joint Board of Directors. As a member-responsive trade association, for NAB to participate meaningfully in this proceeding we must have the matters presented in the *Notice* assessed and decided by our members, through the discussions of our Joint Board.

The NAB Joint Board meets every six months, at locations and at times scheduled years in advance. The June 1998 meeting, here in Washington, will provide NAB staff with the direction needed for the preparation of our comments and reply comments in this proceeding. NAB is confident that the time between the conclusion of the NAB Joint

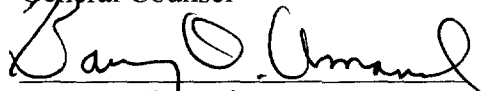
Board meeting and the recommended July 22, 1998, deadline for the filing of initial comments will afford us the time necessary to prepare comments that will afford the Commission with data and other information upon which it can base a decision, report to Congress and chart the course for further proceedings on these issues.

Respectfully submitted,

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April 20, 1998